

# Morgan Lewis

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February 10, 2022

## Via ECF

The Honorable United States District  
United States District Court, Southern  
500 Pearl Street, Room 1950  
New York, NY 10007

Application granted. The pre-motion conference currently scheduled for February 22, 2022 at 11:00 a.m. is canceled. Plaintiff's anticipated motion for conditional certification will be addressed at the pre-motion conference scheduled for April 21, 2022 at 3:30 p.m.

The Clerk of the Court is respectfully directed to terminate the motion sequence pending at Doc. 110.

SO ORDERED.



Philip M. Halpern  
United States District Judge

Dated: White Plains, New York  
February 11, 2022

**Re: Ramirez v. Marriott International, Inc., et al., 20-cv-02397-PMH-PED**

Your Honor:

We write on behalf of Defendants, and with Plaintiff's consent, to jointly request that the telephonic pre-motion conference concerning Plaintiff's anticipated Motion for Conditional Certification, currently scheduled for February 22, 2022 at 11:00 AM (ECF No. 104), be adjourned and that both parties' anticipated Motions be discussed at the **April 21, 2022** telephonic conference.

On August 10, 2021, Your Honor granted Plaintiff's request for a telephonic conference concerning his anticipated Motion for Collective Certification, which was later adjourned to February 22, 2022 due a Court scheduling conflict. ECF. Nos. 83, 104. Thereafter, on February 9, 2022, Your Honor granted Defendants' request for a premotion conference concerning their anticipated Motion for Summary Judgment, which was scheduled for April 21, 2022. ECF. No. 109.

The parties respectfully submit that both of their anticipated Motions can be discussed in a single conference, which will assist in setting a briefing schedule that takes both Motions into consideration. The parties are also actively engaged in discussions concerning the potential private resolution of this matter, including providing to Plaintiff's counsel certain data for the putative class, and hope to conserve resources, including by avoiding multiple conferences and/or

overlapping briefing schedules, while they explore a potential resolution. Accordingly, the parties respectfully request that both Motions be discussed at the April 21 conference.

This is the first time the parties have requested an adjournment (or combination) of the aforementioned pre-motion conferences. No other deadlines will be affected should the parties' request be granted.

Thank you for your consideration.

Respectfully submitted,

/s/ Christopher A. Parlo

Christopher A. Parlo  
*Attorney for Defendants*

cc: All Counsel of Record (via ECF)